

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

FLAVIA BENITEZ,  
Plaintiff,

v.

SODEXHO MARRIOTT SERVICES,  
Defendant.

C.A. No: 04-11959-NG

**AFFIDAVIT OF BRIAN M. HANEY**

I, Brian M. Haney, having first been duly sworn, hereby depose and state:

1. I am an attorney with the law firm of Cooley Manion Jones LLP, licensed to practice law in Massachusetts and admitted to the United States District Court for the District of Massachusetts.
2. I represent the defendant, Sodexho, Inc., misnamed herein as Sodexho Marriott Services, in the above-referenced matter.
3. A true and accurate copy of the following documents are attached hereto as Attachments:
  - A. Defendant's Answers to Plaintiff's First Set of Interrogatories;
  - B. Defendant's Answers to Plaintiff's Second Set of Interrogatories;
  - C. Scheduling Order and Order and Order on Plaintiff's Motions to Compel, for Protective Order, for Appointment of Counsel, and for a Technical Legal Interpreter (Dein, USMJ);
  - D. Order RE Interrogatories (Dein, USMJ);
  - E. Defendant's Supplemented Answers to Plaintiff's Interrogatories Pursuant to the Court's June 6, 2006 Order (dated June 26, 2006);
  - F. Defendant's Supplemented Answers to Plaintiff's Interrogatories Pursuant to the Court's June 6, 2006 Order (dated June 29, 2006);
  - G. Defendant, Sodexho Marriott Services' Response to Plaintiff, Flavia Benitez's First Request for Production of Documents;
  - H. April 24, 2006 letter to Flavia Benitez from Brian M. Haney (without enclosures);
  - I. May 17, 2006 letter to Flavia Benitez from Brian M. Haney (without

- J. enclosures); and  
Defendant, Sodexo Marriott Services' Response to Plaintiff, Flavia Benitez's Notice of Requesting to Produce Documents.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 24<sup>th</sup> DAY OF JULY, 2006.

/s/ Brian M. Haney  
Brian M. Haney